



1125 Atlantic Avenue
Atlantic City, NJ 08401
Phone: 609.344.3161
Toll Free: 800.529.3161
Fax: 609.344.0939
www.cooperlevenson.com

KEVIN J. THORNTON
EMAIL: kthornton@cooperlevenson.com

Direct Phone (609) 572-7502
Direct Fax (609) 572-7503

FILE NO. 58646/00002

October 19, 2020

Via Electronic Filing

Honorable Joel B. Schneider U.S.M.J.
United States District Court
Mitchell H. Cohen Bldg. & U.S. Courthouse
1 John F. Gerry Plaza
Fourth & Cooper Streets
Camden, NJ 08101

Re: David E. Gabros, M.D. v. Shore Medical Center, et al.
Civil Action No.: 1:16-cv-6135 (NLH-JS)

Dear Judge Schneider:

This firm represents Defendant, Shore Medical Center ("SMC"). Timothy J. McIlwain, Esquire, represents Plaintiff, David E. Gabros, M.D.

I received the October 15, 2020 Text Order [159] setting this case down for a Final Pretrial Conference and establishing numerous deadlines.

I write to advise the Court that the Defendant's Motion for Summary Judgment [92] is still pending before the Honorable Noel L. Hillman, U.S.D.J. Furthermore, Defendant filed a Motion to Bar Plaintiff's Expert Witness [79]. Your Honor entered an Order [156] denying that Motion without prejudice. However, Defendant is free to reactivate said Motion if its Summary Judgment Motion is denied.

If both the Summary Judgment Motion and the Motion to Bar the Plaintiff's Expert Witness are denied, then as Your Honor may recall, Plaintiff would likely be required to supply missing Federal income tax records, Defendant would then submit a report by its expert witness, and the respective experts would need to be deposed.

COOPER LEVENSON, P.A.

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Based upon the foregoing, I respectfully submit and request that the Final Pre-Trial Conference be adjourned and rescheduled at a later date based upon the outcome of the above-described Motions.

I thank the Court for its attention to this matter.

Respectfully yours,

Cooper Levenson, P.A.,
Attorneys for Defendant, Shore Medical Center

/s/ Kevin J. Thornton

By: _____
Kevin J. Thornton

KJT/pjb

cc: Timothy J. McIlwain, Esquire (*via Electronic Filing*)

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